

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.**

**IN RE: \$397,625.00 U.S. CURRENCY  
(CATS NO. 24-FBI-003387)**

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**UNITED STATES' UNOPPOSED FIRST MOTION TO ENLARGE TIME TO FILE  
CIVIL FORFEITURE COMPLAINT OR SEEK CRIMINAL FORFEITURE**

Pursuant to 18 U.S.C. § 983(a)(3)(A), the United States of America (“United States”) files this Motion to Enlarge Time to File Civil Forfeiture Complaint or Seek Criminal Forfeiture. In support of this Motion, the Parties state:

1. On or about March 7, 2024, Federal Bureau of Investigation (“FBI”) agents seized \$397,625.00 U.S. Currency (“Seized Asset”).

2. FBI assigned CATS No. 24-FBI-003387 to the Seized Asset, initiated administrative forfeiture proceedings, and sent written notice of seizure to potential claimants in accordance with 18 U.S.C. § 983(a)(1)(A).

3. On May 30, 2024, Abdessalem Mohamed Bouzoumita filed a claim to the Seized Asset, and FBI subsequently referred this matter to the U.S. Attorney’s Office for the Southern District of Florida.

4. The time expired for any person to file a claim to the Seized Asset under 18 U.S.C. § 983(a)(2)(A)-(E). No other person filed a claim to the property as required by law in the nonjudicial civil forfeiture proceeding.

5. Pursuant to 18 U.S.C. § 983(a)(3), within 90 days after a claim is filed, the United States is required to file a civil forfeiture complaint or obtain a criminal indictment containing an allegation that the property is subject to forfeiture. However, the Court may extend the period for

filing a civil forfeiture complaint for good cause shown or upon agreement of the Parties.<sup>1</sup>

6. Pursuant to 18 U.S.C. § 983(a)(3)(A)-(C), the deadline for the United States to file a civil forfeiture complaint or to obtain an indictment alleging that the Seized Asset is subject to forfeiture is September 1, 2024. The United States requests to extend this deadline by 90 days, until November 30, 2024.

7. The United States conferred with counsel for Claimant via telephone on August 9, 2024, regarding the relief requested, and Claimant, through its undersigned counsel, has knowingly, intelligently, and voluntarily agreed to give up any right it may have under 18 U.S.C. § 983(a)(3)(A)-(C) to require the United States to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture no later than November 30, 2024, and any right Claimant may have to seek dismissal of any complaint and/or any indictment on the ground that it was not filed or returned on or before November 30, 2024.

8. There is good cause to extend the deadline from September 1, 2024, to November 30, 2024, as the criminal investigation is ongoing, and the requested extension would afford the United States additional time to investigate this matter and comply with its filter obligations.

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<sup>1</sup> The statute, in relevant part, reads:

- (A) Not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.

18 U.S.C. § 983(3)(A).

WHEREFORE, the United States respectfully request that the Court grant this motion. A proposed order is attached.

Respectfully submitted,

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**UNITED STATES ATTORNEY**

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